

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

BRIGHT IMPERIAL LIMITED,

Plaintiff,

v.

REDTUBES.US, et al.,

Defendant.

Civil Action No. 1:10-cv-572 GBL/JFA

**MOTION FOR DEFAULT JUDGMENT**

Plaintiff Bright Imperial Limited (“Bright”), by and through its undersigned counsel, and pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, hereby moves the Court to enter Default Judgment against Defendant <REDTUBES.US> (the “Infringing Domain Name” or “Defendant”).

As discussed more fully in the accompanying Memorandum of Law in Support of Plaintiff’s Motion for Default Judgment, no person or entity asserting any interest in or right to the Defendant domain has filed a verified statement identifying its interest or right, or to otherwise responded to Bright’s Complaint, within the time period set by the Court’s Order of August 5, 2010. The Defendant is, therefore, in default, and Bright’s right to the transfer of the domain is uncontested.

On September 17, 2010, Bright submitted a request to the Clerk of the Court to enter a default against Defendant. The Clerk of the Court duly entered Defendant’s default on October 1, 2010.

As Defendant is in default, the well-pled allegations of Bright's Complaint should be deemed admitted. Its interest in and right to the Defendant domain being valid and uncontested, Bright respectfully submits that it is entitled to relief requested in its complaint. Accordingly, Bright respectfully moves the Court to enter judgment in its favor and to order the transfer of the domain to Bright. A proposed Order is attached.

This Motion is based on this Motion, the accompanying Memorandum of Law in Support of Plaintiff's Motion for Default Judgment and attached exhibits, the Declarations of Thayer M. Preece and Karin H. Johnson, the pleadings and other papers on file in this action, and any other evidence, authority or argument that may be presented to the Court at or before the time of the hearing.

Respectfully submitted,

Dated: October 22, 2010

/s/ Sheldon M. Kline  
Sheldon M. Kline (VA Bar No. 27959)  
Franklin C. Turner (VA Bar No. 77417)  
James M. Chadwick (admitted *pro hac vice*)  
Thayer M. Preece (admitted *pro hac vice*)  
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*Attorneys for Plaintiff Bright Imperial Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of October, 2010, I electronically filed the foregoing PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT with the Clerk of the Court using the CM/ECF system and that a copy was sent electronically and via airmail, postage prepaid, to the following non-filing party:

Redtubes.us (info@redtubes.us)  
Sid el Bawchrieh  
Bawchrieh 00961  
Lebanon

/s/

Sheldon M. Kline (VA Bar No. 27959)  
Franklin C. Turner (VA Bar No. 77417)  
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